

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

**CHARLESTON DIVISION**

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM  
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

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THIS DOCUMENT RELATES TO THE CASES  
ON THE EXHIBIT ATTACHED HERETO

**JOINT MOTION TO DISMISS WITH PREJUDICE**

Plaintiffs whose cases are listed on the attached Exhibit A, Defendant Coloplast Corp.<sup>1</sup> (“Coloplast”), and Defendant Mentor Worldwide LLC<sup>2</sup> (“Mentor”) advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims, and third-party claims. Accordingly, Plaintiffs, Coloplast and Mentor jointly move the court to dismiss Coloplast and Mentor as defendants in these actions with prejudice, and terminate Coloplast and Mentor from the docket in these actions, parties to bear their own costs. Other defendants remain in these actions, and plaintiff will continue to prosecute these actions against them.

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<sup>1</sup> Coloplast Corp. includes any incorrect or incomplete spellings of this Defendant, including Coloplast, Coloplast A/S, Coloplast Corporation, Coloplast Group, Coloplast Incorporated, Coloplast Manufacturing U.S., L.L.C., Coloplast Manufacturing U.S., LLC, Coloplast Manufacturing US, LLC, Coloplast Manufacturing, LLC, Coloplast Manufacturing, US LLC, Coloplast Manufacturing, US, L.L.C., Coloplast Manufacturing, US, LLC, and Coloplast, Inc.

<sup>2</sup> Mentor Worldwide LLC includes any incorrect or incomplete spellings of this Defendant, including Mentor, Mentor Corporation, Mentor World Wide LLC, Mentor Worldwide, Mentor Worldwide L.L.C., Mentor Worldwide, L.L.C., and Mentor Worldwide, LLC.

Respectfully submitted,

/s/ Lana K. Varney

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*Attorney for Plaintiffs on Exhibit A*

Dated: October 10, 2016

**EXHIBIT A – ONDER SHELTON O’LEARY & PETERSON**

<b>CIVIL ACTION NUMBER</b> (listed numerically in ascending order)	<b>CASE NAME</b>
2:13-cv-07899	Mary Beth Russ, et al. v. Ethicon, Inc., et al.
2:13-cv-08730	Cheryl Johnson v. Ethicon, Inc., et al.

**CERTIFICATE OF SERVICE**

I hereby certify that on October 10, 2016, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this member case.

/s/ Lana K. Varney  
Lana K. Varney